

March 30, 2020

VIA EFILING

The Honorable William J. Fisher
Judge of United States Bankruptcy Court
United States Courthouse
316 North Robert Street
St. Paul, MN 55102

Re: Delvin Lloyd Drinkall v. Corry & Associates; Robert J. Corry, Jr.
Adversary No. 19-03072

Dear Judge Fisher:

This letter is submitted on behalf of Defendants Corry & Associates and Robert J. Corry, Jr., to request relief for an additional seven days from April 2, 2020 (to April 9, 2020) for them to submit an affidavit and documentation to support a position that they have defense on the merits to the claim in the adversary complaint and a short continuance of the hearing now set for April 7, 2020.

Since the hearing on March 17, 2020, I have had multiple communications with Mr. Corry. He has provided account statements and account information for his firm's Trust account from January and February 2019 and some additional information for March 2019. But the specific Trust account was closed in the summer of 2019, and the information that he has provided is all that is currently available electronically. To get additional information and statements for the account, he needs to go to a Wells Fargo branch office to get hard copies of the documentation.

While Colorado, like Minnesota, is under a stay in place order by its Governor, Mr. Corry intends to go to a Wells Fargo branch today. If he is able to do so and obtains additional account information, Defendant's counsel intends to review any information that he provides and prepare an appropriate affidavit for submission to the Court, but



LOMMEN ABDO, P.A.

The Honorable William J. Fisher
March 30, 2020
Page 2

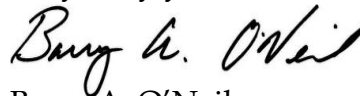
completing that process may require Mr. Corry to undertake additional steps to confirm the purpose for transfers from the Trust account. As a result, to ensure that Defendants are able to submit all of the available information and documentation, Defendants request that the Court allow an additional seven days for Defendants to submit the affidavit and documentation, along with a brief continuance of the April 7, 2020 hearing date. I can represent to the Court that the documentation provided by Mr. Corry appears to indicate that at least one \$50,000 transfer was made back to Mr. Drinkall in February 2019, so it is reasonable to conclude that the additional documentation may further support a defense on the merits of Plaintiff's claims.

Although I advised Mr. Drinkall's counsel of my intention to request a continuance by email earlier today, I have not yet gotten a response. In light of the upcoming hearing, I wanted to make a prompt request for the additional time after speaking with my client this morning.

Accordingly, Defendants Corry & Associates and Robert J. Corry, Jr., respectfully request the Court for an order extending the time to April 9, 2020 for Defendants to submit an affidavit and documentation to support a position that they have defense on the merits to the claim in the adversary complaint, together with a short continuance of the hearing now set for April 7, 2020.

Thank you for your consideration in this regard.

Very truly yours,

A handwritten signature in black ink that reads "Barry A. O'Neil". The signature is written in a cursive, flowing style.

Barry A. O'Neil

BAO/bhs

cc: Paul Sween, Esq., via eservice and email